

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

JESSICA HODGES, as natural )  
Guardian of minor children, et al., )  
 )  
Plaintiffs, )

vs. )

Case Number: cv422-067

)  
CHATHAM COUNTY, GEORGIA; )  
CORRECTHEALTH LLC; )  
CORRECTHEALTH CHATHAM, )  
LLC; CARLO MUSSO, MD; )  
KAREN FORCHETTE; )  
TERENCE JACKSON; )  
DON WHITE; )  
KARLOS MANNING; )  
YVETTE BETHEL-QUINNEY; )  
And JACKIE HARNED; )  
 )  
Defendants. )

**MOTION FOR ADDITIONAL TIME TO RESPOND TO PLAINTIFF’S  
MOTION TO COMPEL**

COME NOW Defendants, Chatham County, Georgia, Karlos Manning and Don White (“County Defendants”) by and through their counsel, hereby request a 7-day extension to file a Brief in response to Plaintiff’s motion to compel filed on January 19, 2023 [Doc 77] and states as follows:

On January 13, 2023, Plaintiffs filed their Motion and Memorandum in Support to County Defendants [Doc 74]. On January 19, 2023, Plaintiffs filed a Motion to Substitute Doc 74 and exhibits with the Motion to Compel filed on

January 19, 2023 [Doc 77]. In that Motion, Plaintiff attached certain exhibits that County Defendants are requesting be kept under seal. Defendants are also filing a separate motion to request those exhibits to be filed under seal.

County Defendants would request the Court grant a 7-day extension for County Defendants to respond to Plaintiff's Motion through and including February 3, 2023.

This 20<sup>th</sup> day of January, 2023.

/s/ R. Jonathan Hart  
**R. JONATHAN HART**  
State Bar No. 333692  
Andre Pretorius  
Andre Pretorius  
State Bar No. 298154

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## **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was served on all counsel of record and filed electronically with the Clerk of Court's CM/ECF system.

This 20<sup>th</sup> day of January, 2023.

Andre Pretorius  
Andre Pretorius  
Assistant County Attorney  
State Bar No. 298154

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Respectfully submitted this 20<sup>th</sup> day of January, 2023.